



***Cabinet for Health and Family Services (CHFS)  
Information Technology (IT) Policy***



**070.400 CHFS Information Technology (IT) Standards,  
Policies, and Procedures (SPP) Team Charter**



**Version 2.2  
November 6, 2017**

070.400 CHFS IT Standards, Policies, and Procedures (SPP) Team Charter	Current Version: 2.2
070.000 Administration	Review Date: 11/06/2017

## Revision History

Date	Version	Description	Author
5/2/2005	1.0	Effective Date	CHFS IT Policies Team Charter
11/6/2017	2.2	Revision Date	CHFS OATS Policy Charter Team
11/6/2017	2.2	Review Date	CHFS OATS Policy Charter Team

## Sign-Off

Sign-off Level	Date	Name	Signature
CHFS Chief Information Officer (or designee)	11/6/2017	ROBERT E PUTT	
CHFS Chief Security Officer (or designee)	11/6/2017	DENNIS E. LOBER	

070.400 CHFS IT Standards, Policies, and Procedures (SPP) Team Charter	Current Version: 2.2
070.000 Administration	Review Date: 11/06/2017

## Table of Contents

<b>070.400 IT STANDARDS, POLICIES, AND PROCEDURES (SPP) TEAM CHARTER .....</b>	<b>4</b>
<b>1 POLICY OVERVIEW.....</b>	<b>4</b>
1.1 PURPOSE .....	4
1.2 SCOPE .....	4
1.3 MANAGEMENT COMMITMENT.....	4
1.4 COORDINATION AMONG ORGANIZATIONAL ENTITIES .....	4
1.5 COMPLIANCE .....	5
<b>2 ROLES AND RESPONSIBILITIES .....</b>	<b>5</b>
2.1 CHIEF INFORMATION SECURITY OFFICER (CISO) .....	5
2.2 SECURITY/PRIVACY LEAD .....	5
2.3 HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPAA) PRIVACY OFFICER .....	5
2.4 CHFS STAFF AND CONTRACTOR EMPLOYEES .....	6
<b>3 POLICY REQUIREMENTS .....</b>	<b>6</b>
3.1 GENERAL .....	6
3.2 MEMBERSHIP OF OATS SPP CHARTER TEAM.....	6
3.3 FREQUENCY OF TEAM MEETINGS.....	7
3.4 APPROVAL PROCESS FOR DOCUMENT REVIEW AND IMPLEMENTATION .....	7
<b>4 POLICY DEFINITIONS.....</b>	<b>7</b>
<b>5 POLICY MAINTENANCE RESPONSIBILITY .....</b>	<b>8</b>
<b>6 POLICY EXCEPTIONS .....</b>	<b>8</b>
<b>7 POLICY REVIEW CYCLE.....</b>	<b>8</b>
<b>8 POLICY REFERENCES .....</b>	<b>8</b>

070.400 CHFS IT Standards, Policies, and Procedures (SPP) Team Charter	Current Version: 2.2
070.000 Administration	Review Date: 11/06/2017

# 070.400 IT Standards, Policies, and Procedures (SPP) Team Charter

Category: 070.000 Administration

## 1 Policy Overview

### 1.1 Purpose

The Cabinet for Health and Family Services (CHFS) Office of Administrative and Technology Services (OATS) must implement an acceptable level of security controls when reviewing, updating, creating, and retiring IT documents, through a defined and approved Team Charter Group. This document establishes the agency's Information Technology (IT) Standards, Policies, and Procedures (SPP) Team Charter Policy to manage risks and provide guidelines for security best practices regarding OATS IT policy and procedure documents.

### 1.2 Scope

The scope of this policy applies to all internal CHFS employees, consultants, temporary personnel, third party providers under contract with a CHFS agency, and other entities that interact with CHFS information related resources. This policy covers the applicable computer hardware, software, application, configuration, business data, and data communication systems. External vendors providing information security or technology services may work with the CHFS agency(s) to request an exception to this policy.

### 1.3 Management Commitment

This policy has been approved by OATS Division Directors, CHFS Chief Technical Officials, and CHFS Chief Information Officer (CIO). Senior Management supports the objective put into place by this policy. Violations may result in disciplinary action, which may include suspension, restricted access, or more severe penalties up to and including termination of employment. Where illegal activities or theft of CHFS property (physical or intellectual) are suspected, CHFS may report such activities to the appropriate authorities.

### 1.4 Coordination among Organizational Entities

OATS coordinates with other organizations or agencies within the Cabinet with access to applications or systems. All organizational entities that interact with CHFS systems, within or contracted by OATS, are subject to follow requirements outlined within this policy. External vendors, or other defined groups/organizations, providing information security or technology services may work with the CHFS agency(s) when seeking an exception to this policy.

070.400 CHFS IT Standards, Policies, and Procedures (SPP) Team Charter	Current Version: 2.2
070.000 Administration	Review Date: 11/06/2017

## **1.5 Compliance**

As the official guidance domain for this policy, CHFS agencies abide by the security and privacy requirements established in state laws and regulations as well as federal guidelines outlined in the National Institute of Standards and Technology (NIST). Applicable agencies additionally follow security and privacy frameworks outlined within the Centers for Medicare and Medicaid Services (CMS), the Internal Revenue Services (IRS), and the Social Security Administration (SSA).

## **2 Roles and Responsibilities**

### **2.1 Chief Information Security Officer (CISO)**

This position is responsible for the assessment, planning, and implementation of all security standards, practices, and commitments required. This position is responsible to adhere to this policy.

### **2.2 Security/Privacy Lead**

Individual(s) designated by division leadership to coordinate privacy and/or security issues and incidents with all appropriate personnel. This individual(s) is responsible for providing privacy and security guidance for protection of Personally Identifiable Information (PII), Electronic Personal Health Information (ePHI), Federal Tax Information (FTI) and other sensitive information to all CHFS staff and contractor personnel. This role is responsible for the adherence of this policy along with the CHFS OATS Information Security (IS) Team.

### **2.3 Health Insurance Portability and Accountability Act (HIPAA) Privacy Officer**

An attorney within CHFS Office of Legal Services (OLS) fills the Health Insurance Portability and Accountability Act (HIPAA) Privacy Officer position. This position is responsible for conducting HIPAA mandated risk analysis on information provided by the CISO or CHFS OATS Information Security (IS) Team. The HIPAA Privacy Officer will coordinate with the Information Security Agency Representative, the CISO, or CHFS OATS IS Team, and other CHFS agencies to ensure compliance with HIPAA notification requirements in the event of a breach. This position is responsible for reporting identified HIPAA breaches to Health and Human Services (HHS) Office of Civil Rights (OCR) and keeping records of risk analyses, breach reports, and notifications in accordance with HIPAA rules and regulations.

070.400 CHFS IT Standards, Policies, and Procedures (SPP) Team Charter	Current Version: 2.2
070.000 Administration	Review Date: 11/06/2017

## **2.4 CHFS Staff and Contractor Employees**

All CHFS staff, contract employees, and other applicable vendor/contract staff must adhere to this policy. All personnel must comply with referenced documents that pertain to the agency's applications, application servers, appliances, operating systems, web servers, network components, and database (server or components) that reside on CHFS/OATS information system(s).

# **3 Policy Requirements**

## **3.1 General**

The OATS SPP Charter Team oversees the development and maintenance of CHFS IT standards, policies, and procedures. CHFS follows all Enterprise standards, policies, and procedures as published by the Commonwealth Office of Technology (COT). The SPP Charter Team's objective is to establish IT documents that meet state and federal regulation requirements (i.e. NIST, CMS, IRS, SSA, etc.) through the application of Enterprise and CHFS OATS IT documents. This group is responsible for the review, updates, and approvals of OATS IT standards, policies, and procedures. The group reviews OATS standards on an as a needed basis while the OATS policies and procedures are reviewed on an annual basis.

## **3.2 Membership of OATS SPP Charter Team**

The OATS SPP Charter Team is comprised of members within various divisions housed in CHFS OATS. The SPP Charter Team members consist of staff from the following areas:

- Division of Eligibility Systems (DES) Member(s)
- Division of Facilities Management (DFM) Member(s)
- Division of General Accounting (DGA) Members(s)
- Division of Medicaid Systems (DMS) Member(s)
- Division of Procurement and Grant Oversight Services (DPGOS) Member(s)
- Division of Social Support Systems (DSSS) Member(s)
- Division of Strategic Services (DSS) Member(s)
- OATS Information Security (IS) and Compliance Team Member(s)
- Non-voting Administrative Organizer
- Additional Non-Voting OATS Member(s)

SPP Charter team members are reviewed on an annual basis, or more often if needed, to ensure appropriate division personnel throughout OATS are represented appropriately. The SPP Team Charter will review and vote/agree upon changes to the SPP group membership during this annual review. Additional OATS staff may be a part of review/updates as deemed necessary but may not be a formal voting member. These additional OATS staff, will provide information/input to assist in ensuring IT documentation is as accurate as possible.

070.400 CHFS IT Standards, Policies, and Procedures (SPP) Team Charter	Current Version: 2.2
070.000 Administration	Review Date: 11/06/2017

### **3.3 Frequency of Team Meetings**

The SPP Charter Team meets (via teleconference, in person, or email) on a monthly basis, however, the team may elect to meet more frequently if required by the workload.

### **3.4 Approval Process for Document Review and Implementation**

All CHFS IT policies are approved by following the process as outlined below:

- CHFS SPP Team Charter meets on a monthly basis to review, update, and comment on selected policies.
- Policies must be approved by a majority of the voting members on the SPP Charter Team.
- Policies are then reviewed and approved by a majority of the OATS Division Directors, or designee(s).
- Policies are then reviewed, approved, and if applicable signed, by the CHFS Chief Information Security Officer (CISO) and/or CHFS Chief Technical Officer (CTO).
- Vetted and approved policies then reviewed, approved, and signed by the CHFS Chief Information Officer (CIO).
- The Charter Team Non-Voting Administrative Organizer is then responsible for ensuring that approved IT documents are posted to the CHFS website, the IT intranet, or designated published place, as they are reviewed, approved, updated, signed, and implemented.

## **4 Policy Definitions**

- **Confidential Data:** Defined by COT standards, is data of which the Commonwealth has a legal obligation not to disclose. This data requires the highest levels of restrictions, because of the risk or impact that will result from disclosure, modifications, breach, or destruction of that data. Examples would include, but are not limited to, data not releasable under the Kentucky State law, Protected Health Information, Federal Tax Information, and Social Security and Credit Card Numbers.
- **Sensitive Data:** Defined by COT standards, is data that is not legally protected, but should not be considered public information and only be disclosed under limited circumstances. Only authorized users should be granted access to sensitive data. Examples include, but are not limited to, information identifiable to an individual (i.e. dates of birth, driver's license numbers, employee ID numbers, license plate numbers, and compensation information) and Commonwealth proprietary information (i.e. intellectual property, financial data, and more.)

070.400 CHFS IT Standards, Policies, and Procedures (SPP) Team Charter	Current Version: 2.2
070.000 Administration	Review Date: 11/06/2017

## 5 Policy Maintenance Responsibility

The OATS IS Team is responsible for the maintenance of this policy.

## 6 Policy Exceptions

Any exceptions to this policy must follow the guidance established in CHFS OATS Policy: 070.203- Security Exceptions and Exemptions to CHFS OATS Policies and Security Control Policy.

## 7 Policy Review Cycle

This policy is reviewed at least once annually, and revised on an as needed basis.

## 8 Policy References

- Centers for Medicare and Medicaid Services (CMS) MARS-E 2.0
- CHFS OATS IT Charter Team Charter Members Document
- CHFS OATS IT Policies
- CHFS OATS IT Standards
- CHFS OATS Policy: 070.203- Security Exceptions and Exemptions to CHFS OATS Policies and Security Control Policy
- Internal Revenue Services (IRS) Publication 1075
- National Institute of Standards and Technology (NIST) Special Publication 800-12 Revision 1, Introduction to Information Security (Draft)
- National Institute of Standards and Technology (NIST) Special Publication 800-18 Revision 1, Guide for Developing Security Plans for Federal Information Systems
- National Institute of Standards and Technology (NIST) Special Publication 800-53 Revision 4, Security and Privacy Controls for Federal Information Systems and Organizations
- Social Security Administration (SSA) Security Information